

REMARKS

Applicants have carefully reviewed the Office Action dated March 19, 2004. Claims 1-14 and 16-45 are pending in this application. Applicants have amended Claims 1, 14, 17, 32 and 36 to more clearly point out the present inventive concept. Reconsideration and favorable action is respectfully requested.

Claims 1-14 and 16-45 stand rejected under 35 U.S.C. §103(a) as being unpatentable over the combination of the *Hsieh et al* U. S. Patent Nos. 5,559,971 and 5,603,061, and *Mu et al*, U. S. Patent No. 5,428,750 and *Hilley et al*, or the combination of *Hsieh*, *Hilley*, and *Mano's Computer System Architecture*. This rejection is respectfully traversed with respect to the amended claims.

For the purpose of this discussion, Applicants will consider that the Examiner's reference to "Wu" refers to the *Mu* reference.

As noted previously, Applicants' present inventive concept is directed toward a cross-bar switch wherein there are input signals that have a priority and the switch is configured such that only selected destinations can be connected to the high priority signals whereas the lower priority signals can be connected to more destinations than the high priority signals. As such, it may be that only two out of twenty output connections are available to a high priority signal whereas the lowest priority signal may have access to all destinations if they are available due to the fact that a higher priority signal has not been connected thereto.

As noted in the previous Office Action, the *Hsieh*, *Mu* and *Mano* references all have a single deficiency; that is, they all have the ability to connect each input signal to all of the output signals. The Examiner has utilized the *Hilley* reference as disclosing a prioritizing switch with preset priority value to its ports, specifically referring to Column 3, Second paragraph therein.

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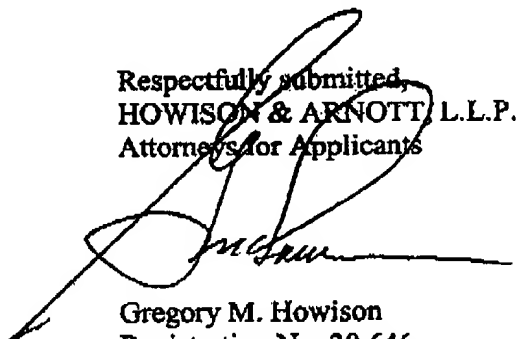
The *Hilley* reference is a reference that utilizes a memory arbitration system. There are provided two input ports having a priority associated therewith for connection to a single input of a memory. The arbitration is such that the input signal can have a priority associated therewith such that one input signal may have priority over the other one. For example, there are two ports, Port A and Port B. If Port A is determined to be the highest priority signal, then the arbiter will always allow a memory request from Port A to override that of Port B and provide the connection thereto with Port A. Although Applicants believe that this is not analogous art due to the fact that this not a cross-bar switch, there is a priority switching function that connects two ports to a single output. However, in the *Hilley* reference, all of the inputs are connectable to a single output. Therefore, the limitation in the claim wherein the high priority signals are connectable to less than the number of destinations to which the low priority signals are connectable cannot be satisfied. Further, a cross-bar switch is one wherein a configuration is normally set such that the connection is "fixed." The *Hilley* reference is one wherein another signal can be input and override the request of a second signal, i.e., both of the signals are essentially coupled to the same output and cannot meet the limitation that the signals "are routed to respective destinations as a function of the priority assigned to said signals" in Claim 1. Thus, since this an arbitration scheme as opposed to a cross-bar switching scheme, the arbitration system will not allow the coupling to "different" destinations on the output. They are not routed to respective destinations as a function of priority, as they can only be routed to one destination and the number of destinations that can be coupled to a higher priority signal cannot be less than the lower priority signal, since this is a single output/multiple input device. Thus, the arbitration operation of the *Hilley* reference does not meet many of the limitations of Claim 1. Therefore, Applicants believe that *Hilley* does not cure the deficiencies noted in the previous Response with respect of the combination of *Hsieh*, *Mu* and *Mano*. Therefore, Applicants respectfully request the withdrawal of the 35 U.S.C. §103(a) rejection with respect to Claims 1, 14, 17, 32 and 36. The remaining claims are dependent therefrom and, for the reasons described hereinabove, are also believed to overcome the combination of these references. Further, the combination of *Hsieh* with *Hilley* and *Mano*, without *Mu*, is also believed to be deficient in that *Hilley* does not cure the references noted in the prior response with respect to the combination of *Hsieh* and *Mano*. Thus, Applicants respectfully request the withdrawal of the U.S.C. § 103(a) rejection of Claims 1-14 and 16-45 in view of the combination of *Hsieh*, *Hilley* and *Mano*.

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Applicants have now made an earnest attempt in order to place this case in condition for allowance. For the reasons stated above, Applicants respectfully request full allowance of the claims as amended. Please charge any additional fees or deficiencies in fees or credit any overpayment to Deposit Account No. 20-0780/CYGL-24,696 of HOWISON & ARNOTT, L.L.P.

Respectfully submitted,
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